

UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF SOUTH CAROLINA
 ROCK HILL DIVISION

INTERNATIONAL SAFETY ACCESS)	
CORPORATION,)	Civil Action No.: 0:09-CV-00315-MJP
)	
Plaintiff,)	DEFENDANTS' MOTION: (A) TO
)	PIERCE THE CORPORATE VEIL;
v.)	AND (B) FOR DETERMINATION
INTEGRITY WORLDWIDE, INC., and)	THAT ASSETS OF PLAINTIFF ARE
JOHN MELIC,)	NOT SUBJECT TO A SECURITY
)	INTEREST
<u>Defendants.</u>)	

AND NOW COME Defendants Integrity Worldwide, Inc. ("IWW") and Jonathan J. Melic ("Mr. Melic") (collectively "IWW"), by and through their undersigned attorneys, and move this Court for: (A) an order piercing the corporate veil of Plaintiff International Safety Access Corporation; and (B) a determination that that — contrary to Plaintiff's assertions — its assets are not subject to a security interest. The bases for this Motion are fully set forth in the accompanying Memorandum in Support (with exhibits) which is appended hereto and incorporated herein by reference as if set forth at length.

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 LLC

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